FCC 12-152

Before the **Federal Communications Commission** Washington, D.C. 20554

In the Matter of)	
Notice of Proposed Rulemaking 18 FCC Rcd 13187, 13188 ¶1 (2003))	ET Docket No. 03-137
18 1 CC RCu 13187, 13188 [[1 (2003))	E1 Docket No. 03-137
And)	
Service Rules for the Advanced Wireless Services)	WT Docket No. 12-357
H BlockImplementing Section 6401 of the)	
Middle Class Tax Relief and Job Creation Act of)	
2012 Related to the 1915-1920 MHz and)	
1995-2000 MHz Bands ¶53 footnote 95)	

Office of the Secretary To:

Federal Communications Commission

Washington, DC 20554

Comment Filed by: Tom Creed

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February 05, 2013

AFFIDAVIT OF (Tom Creed; State of Texas, Denton County)

I, <u>Tom Creed</u>, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

- 1. My name is <u>Tom Creed</u>. My address is <u>Carrollton, Texas, 75007</u>.
- 2. I am an IT consultant. by occupation.
- 3. I am an individual who is sensitive to electromagnetic radiation. I have noticed over several years evidence of health detriments due to the increasing levels of radiofrequency radiation density in my everyday residential, workplace, and public environments. There is at least an anecdotal relationship of health stressors and symptoms to the preponderance of radiofrequency emitting devices and services in my environments.
- 4. Informal measurement of individual radiofrequency emitting sources in my environment shows commonly occurring levels of 2,000 microwatts/m2 and greater. The yearly proliferation of radiofrequency emitting devices (some in my control, but many not) in my environment can result in a cumulative EMR level of approximately 20,000 microwatts/m2 or greater when multiple sources are emitting concurrently.
- 5. The recent trend of research information increasingly indicates that the commonly accepted <u>guidelines</u> of 1,000 microwatts/m2 for maximum safe exposure are frequently exceeded and the guidelines as well as regulatory standards are probably too high. Radiofrequency fields has been classified as "possibly carcinogenic to humans by The World Health Organization's International Agency for Research on Cancer (IARC)."
 The <u>Environmental Working Group</u> has reviewed scientific literature on radiofrequency biologic effects. The EWG provides a <u>Guide To Safer Cell Phone Usage</u> which alerts individuals to the potential health impacts of radiofrequency radiation. There are numerous good overviews and <u>summaries</u> of EMF 'fog' (general broad spectrum electromagnetic radiation loads, including radiofrequency) trends and biologic impacts exist.
- 6. The body of research information on over the past 50years into EMF levels and effects coupled with principles of prudence and 'do no harm' argues for better public awareness of the risks and availability of options to mitigate the radiofrequency density in everyday residential, workplace, and public environments.
 In light of the overwhelming evidence of adverse effects from even low levels of EMR the FCC continues to use a biological tissue thermal heating model for its EMR safety guidelines. This leaves the FCC in a position of being less than informative and certainly not authoritative with regard to EMR effects.
- 7. I urge the FCC to recommend RF safety guidelines which generally follow a 'do no harm' policy of minimal exposure to EMR and specifically RF fields for humans and probably all living things. In developing quantitative recommendations the FCC should take into account the weight of modern and reliable research on biological impacts due to RF fields. Regardless of any specific quantitative RF field safety recommendations that may be developed there should be a general 'do no harm' recommendation of minimal exposure and clearly recognizable measured RF levels available to inhabitants of all engineered environments.

Respectfully submitted, February 05, 2013 by -Tom Creed (Carrollton, Texas, 75007)